

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD) (SN)

Civil Docket Number: \_\_\_\_\_

**IRAN SHORT FORM**  
**COMPLAINT AND DEMAND**  
**FOR TRIAL BY JURY**

BNY Mellon, as the Personal Representative of the Estate of Humberto Ailinger, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Humberto Ailinger

Brian Wilkes, individually, as surviving spouse of Lorraine Antigua

John Doe 76, being intended to designate the Personal Representative of the Estate of Lorraine Antigua, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Lorraine Antigua

Joan Ruth Puwalski, individually, as surviving spouse of Steven J. Bates

John Doe 70, being intended to designate the Personal Representative of the Estate of Steven J. Bates, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Steven J. Bates

BNY Mellon as Personal Representative of the Estate of Ivhan Bautista, as the Personal Representative of the Estate of Ivhan Bautista, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Ivhan Bautista

Justin Johnson, individually, as surviving child of Janice Brown

John Doe 77, being intended to designate the Personal Representative of the Estate of Janice Brown, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Janice Brown

Emily Cournoyer, as Personal Representative of the Estate of Alice Beaton, deceased, the late sibling of John Cahill

Nicole Mayer, individually, as surviving child of Peter J. Carroll

Pete Carroll, individually, as surviving child of Peter J. Carroll

Christopher Carroll, individually, as surviving child of Peter J. Carroll

Michael Carroll, individually, as surviving child of Peter J. Carroll

Kevin Carroll, individually, as surviving sibling of Peter J. Carroll

Patricia D'Agata, individually, as surviving sibling of Peter J. Carroll

Brieann Centro, individually, as surviving child of Alexander Centro, Jr.

Alexander Centro, individually, as surviving child of Alexander Centro, Jr.

Alexander Centro, as the Personal Representative of the Estate of Alexander Centro, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Alexander Centro, Jr.

Craig Centro, individually, as surviving child of Alexander Centro, Jr.

Craig Centro, as Personal Representative of the Estate of Italia Centro, deceased, the late parent of

Alexander Centro, Jr.

Anthony Chiofalo, individually, as surviving sibling of Nicholas Chiofalo

Donna Chiofalo, individually, as surviving sibling of Nicholas Chiofalo

Annette Melillo, individually, as surviving sibling of Nicholas Chiofalo

Rosemarie Maggiore, individually, as surviving parent of Nicholas Chiofalo

George Coughlin, as Personal Representative of the Estate of Mary Elizabeth Coughlin, deceased, the late parent of John G. Coughlin

George Coughlin, individually, as surviving sibling of John G. Coughlin

Carol L. D'Allara, as the Personal Representative of the Estate of John D'Allara, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of John D'Allara

Daniel D'Allara as Personal Representative of the Estate of John D'Allara, Sr., deceased, the late parent of John D'Allara

Daniel D'Allara as Personal Representative of the Estate of Helen D'Allara, deceased, the late parent of John D'Allara

John Joseph D'Allara, individually, as surviving child of John D'Allara

Nicholas Michael D'Allara, individually, as surviving child of John D'Allara

Carol L. D'Allara, individually, as surviving spouse of John D'Allara

RoseEllen Dowdell, individually, as surviving spouse of Kevin Christopher Dowdell

RoseEllen Dowdell, as the Personal Representative of the Estate of Kevin Christopher Dowdell, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Kevin Christopher Dowdell

Patrick Kevin Dowdell, individually, as surviving child of Kevin Christopher Dowdell

James Michael Dowdell, individually, as surviving child of Kevin Christopher Dowdell

Amy Eberling, individually, as surviving spouse of Dean P. Eberling

Amy Eberling, as the Personal Representative of the Estate of Deal P. Eberling, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Dean P. Eberling

Corinne Ardente, individually, as surviving child of Dean P. Eberling

Lauren Eberling, individually, as surviving child of Dean P. Eberling

Beverly Epps, individually, as surviving sibling of Christopher Samuel Epps

Debra Epps, individually, as surviving sibling of Christopher Samuel Epps

Valerie Epps Kendall, individually, as surviving sibling of Christopher Samuel Epps

Chundera Epps, individually, as surviving sibling of Christopher Samuel Epps

Robert Epps, individually, as surviving sibling of Christopher Samuel Epps

John Doe 73, as Personal Representative of the Estate of Geneva Epps, deceased, the late parent of Christopher Samuel Epps

John Doe 74, being intended to designate the Personal Representative of the Estate of Christopher Samuel Epps, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Christopher Samuel Epps

Theresa Fiorelli, individually, as surviving spouse of Stephen J. Fiorelli

Theresa Fiorelli, as the Personal Representative of the Estate of Stephen J. Fiorelli, deceased, and on behalf of all survivors and all legally entitled beneficiaries

and family members of Stephen J. Fiorelli

Stephen J. Fiorelli, Jr., individually, as surviving child of Stephen J. Fiorelli

Christine Epstein, individually, as surviving child of Stephen J. Fiorelli

William Fiorelli, individually, as surviving sibling of Stephen J. Fiorelli

Kenneth Fiorelli, individually, as surviving sibling of Stephen J. Fiorelli

Karen Fiorelli, individually, as surviving sibling of Stephen J. Fiorelli

John Doe 68, being intended to designate the Personal Representative of the Estate of Anthony E. Gallagher, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Anthony E. Gallagher

Laurie Gambino, individually, as surviving sibling of Thomas Gambino, Jr.

Marilyn Hess, individually, as surviving parent of Thomas Gambino, Jr.

Thomas Gambino, Sr., individually, as surviving parent of Thomas Gambino, Jr.

Keith Gambino, individually, as surviving sibling of Thomas Gambino, Jr.

Valerie Gambino, individually, as surviving sibling of Thomas Gambino, Jr.

Thomas Gambino, III, individually, as surviving child of Thomas Gambino, Jr.

Brian Gambino, individually, as surviving child of Thomas Gambino, Jr.

Janet Gambino, individually, as surviving spouse of Thomas Gambino, Jr.

Janet Gambino, as the Personal Representative of the Estate of Thomas Gambino, Jr., deceased, and on

behalf of all survivors and all legally entitled beneficiaries and family members of Thomas Gambino, Jr.

John T. Genovese, individually, as surviving sibling of Steven Genovese

John T. Genovese as Personal Representative of the Estate of Veronica Genovese, deceased, the late parent of Steven Genovese

John T. Genovese as Personal Representative of the Estate of John G. Genovese, deceased, the late parent of Steven Genovese

John T. Genovese, as the Personal Representative of the Estate of Steven Genovese, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Steven Genovese

Patti Ann Valerio, individually, as surviving sibling of Matthew J. Grzymalski

Paul Joseph Grzymalski, individually, as surviving sibling of Matthew J. Grzymalski

Peter John Grzymalski, individually, as surviving sibling of Matthew J. Grzymalski

Joseph Walter Grzymalski, individually, as surviving sibling of Matthew J. Grzymalski

Jo Ann McManus, individually, as surviving sibling of Matthew J. Grzymalski

Patricia Byrne, individually, as surviving sibling of Joseph Gullickson

Patricia Gullickson as Personal Representative of the Estate of Robert Gullickson, Sr., deceased, the late parent of Joseph Gullickson

Thomas Gullickson, individually, as surviving sibling of Joseph Gullickson

Patricia Gullickson, individually, as surviving parent of Joseph Gullickson

Ralph Gullickson, individually, as surviving sibling of Joseph Gullickson

Robert Gullickson, Jr., individually, as surviving sibling of Joseph Gullickson

Jake Halloran, individually, as surviving child of Vincent G. Halloran

Kieran Halloran, individually, as surviving child of Vincent G. Halloran

Marie Halloran, as Natural Guardian of PH, a minor, as surviving child of Vincent G. Halloran

Declan Halloran, individually, as surviving child of Vincent G. Halloran

Marie Halloran, individually, as surviving spouse of Vincent G. Halloran

Marie Halloran, as the Personal Representative of the Estate of Vincent Gerard Halloran, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Vincent G. Halloran

Iris Marie Holohan, individually, as surviving parent of Thomas P. Holohan

Mary Alice Holohan, individually, as surviving sibling of Thomas P. Holohan

Megan Holohan, individually, as surviving sibling of Thomas P. Holohan

Sean Holohan, individually, as surviving sibling of Thomas P. Holohan

Aidan Halloran, individually, as surviving child of Vincent G. Halloran

Conor Halloran, individually, as surviving child of Vincent G. Halloran

John Doe 83, being intended to designate the Personal Representative of the Estate of Timothy Haviland, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Timothy Haviland

Jesse Kemp, individually, as surviving child of Timothy Haviland

Barbara Keane, as Personal Representative of the Estate of Amy Haviland, deceased, the late spouse of Timothy Haviland

Harold Hughes, individually, as surviving sibling of Thomas F. Hughes, Jr.

Tara Leonardi, individually, as surviving sibling of Thomas F. Hughes, Jr.

Erin Murray as Personal Representative of the Estate of Kevin T. Hughes, deceased, the late sibling of Thomas F. Hughes, Jr.

Mark F. Hughes, individually, as surviving sibling of Thomas F. Hughes, Jr.

Martin S. Hughes as Personal Representative of the Estate of Frances S. Hughes, deceased, the late parent of Thomas F. Hughes, Jr.

Martin S. Hughes, individually, as surviving sibling of Thomas F. Hughes, Jr.

Plaintiff(s),

- against -

ISLAMIC REPUBLIC OF IRAN,

Defendant.

Plaintiffs named herein by and through the undersigned counsel file this Short Form Complaint against Defendant, the Islamic Republic of Iran (“Iran”), arising out of the September 11, 2001 terrorist attacks (“September 11, 2001 Terrorist Attacks”), as permitted and approved by the Court’s Order of October 28, 2019, ECF No. 5234. Each Plaintiff incorporates by reference the specific allegations, as indicated below, of (a) the Federal Insurance and Ashton Plaintiffs’ Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237, or (b) the Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53.

Upon filing this Iran Short Form Complaint, each Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all



causes of action contained within that complaint; all prior filings in connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at Havlish v. Bin Laden, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; In re Terrorist Attacks on September 11, 2001, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

### **VENUE**

1. Venue in this district is proper pursuant to 28 U.S.C. §§ 1391(b)(2) and 1391(f)(1), as a substantial part of the events giving rise to the claims asserted herein occurred in this district. Venue is also proper in this district pursuant to 18 U.S.C. § 2334(a).

### **JURISDICTION**

2. Jurisdiction against the Islamic Republic of Iran is premised on the grounds set forth in the complaints specified below, including but not limited to 28 U.S.C. § 1605(a) (tort exception to the Foreign Sovereign Immunities Act), 28 U.S.C. § 1605A (terrorism exception to the Foreign Sovereign Immunities Act), and 28 U.S.C. § 1605B (Justice Against Sponsors of Terrorism Act).

### **CAUSES OF ACTION**

3. Each Plaintiff hereby adopts and incorporates by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against the Islamic Republic of Iran, as set forth in the following complaint [**check only one complaint**]:

☐ Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237

☒ Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53

4. In addition, each Plaintiff hereby asserts the following additional causes of action:

☒ Iran Short Form Complaint First Cause of Action to Recover Wrongful Death Damages Pursuant to 28 U.S.C. § 1605B (the Justice Against Sponsors of Terrorism Act or JASTA) and 18 U.S.C. § 2333 *et seq.* (the Anti-Terrorism Act or ATA)

As a factual basis for this cause of action, Plaintiff(s) allege that the allegations set forth in the complaint noted above, as well as the allegations set forth in the Havlish filings noted above, establish that, as set forth herein, the injuries they suffered arose from the September 11, 2001 Terrorist Attacks; Defendant's role in the September 11, 2001 Terrorist Attacks constituted acts of international terrorism that violated state and federal laws pursuant to 18 U.S.C. § 2331; that the September 11, 2001 Terrorist Attacks constituted acts of international terrorism committed, planned or authorized by an organization that had been designated as a foreign terrorist organization under 8 U.S.C. § 1189; that the September 11, 2001 Terrorist Attacks violated state and federal laws pursuant to 18 U.S.C. § 2331; and that Defendant aided and abetted, by knowingly providing substantial assistance, with others and/or conspired with others who committed an act or acts of international terrorism in violation of 18 U.S.C. § 2333 *et seq.*

☐ Iran Short Form Complaint First Cause of Action to Recover Personal Injury Damages Pursuant to 28 U.S.C. § 1605B (the Justice Against Sponsors of Terrorism Act or JASTA) and 18 U.S.C. § 2333 *et seq.* (the Anti-Terrorism Act or ATA)

As a factual basis for this cause of action, Plaintiff(s) allege that the allegations set forth in the complaint noted above, as well as the allegations set forth in the Havlish filings noted above, establish that, as set forth herein, the injuries they suffered arose from the September 11, 2001 Terrorist Attacks; Defendant's role in the September 11, 2001 Terrorist Attacks constituted acts of international terrorism that violated state and federal laws pursuant to 18 U.S.C. § 2331; that the September 11, 2001 Terrorist Attacks constituted acts of international terrorism committed, planned or authorized by an organization that had been designated as a foreign terrorist organization under 8 U.S.C. § 1189; that the September 11, 2001 Terrorist Attacks violated state and federal laws pursuant to 18 U.S.C. § 2331; and that Defendant aided and abetted, by knowingly providing substantial assistance, with others and/or conspired with others who committed an act or acts of international terrorism in violation of 18 U.S.C. § 2333 *et seq.*

### **IDENTIFICATION OF NEW PLAINTIFFS**

5. The following allegations and information are alleged on behalf of each individual who is bringing this claim, as indicated on Appendix 1 to this Iran Short Form Complaint, herein referred to as “Plaintiffs.”

- a. The citizenship/nationality of each Plaintiff is indicated at Appendix 1 to this Iran Short Form Complaint.
- b. Plaintiff is entitled to recover damages on the causes of action set forth in the complaint identified above, as joined by this Iran Short Form Complaint, and as further asserted within this Iran Short Form Complaint.
- c. As indicated at Appendix 1, Plaintiff (i) is the estate representative of someone who was killed as a result of the September 11, 2001 Terrorist Attacks; (ii) is the surviving immediate family member of someone who was killed as a result of the September 11, 2001 Terrorist Attacks; and/or (iii) suffered physical injuries as a result of the September 11, 2001 Terrorist Attacks.
- d. For those plaintiffs with personal injury claims, as indicated in Appendix 1, on or after September 11, 2001, said Plaintiff was present at the Pentagon and/or the World Trade Center site and/or its surroundings and/or lower Manhattan and/or at an area wherein he/she was exposed to toxins as a result of the terrorist attacks and was exposed to toxins from the attacks, and/or was otherwise injured, and/or as otherwise alleged, as stated specifically in Appendix 1.
- e. For those plaintiffs with personal injury and/or wrongful death claims, as indicated in Appendix 1, as a direct, proximate and foreseeable result of Defendant’s actions or inactions, Plaintiff or his or her decedent suffered bodily injury and/or death, and consequently economic and other losses, including but not limited to pain and suffering, emotional distress, psychological injuries, and loss of enjoyment of life, and/or as described in the Iran Short Form Complaint, and/or as otherwise may be specified in subsequent discovery proceedings, and/or as otherwise alleged in Appendix 1.
- f. The name, relationship to the injured and/or deceased September 11 victim, residency, citizenship/nationality, and the general nature of the claim for each plaintiff asserting wrongful death and/or solatium claims is listed on the attached Appendix 1, and is incorporated herein as allegations, with all allegations of the related complaints, as specified above, deemed alleged as to each Plaintiff.

### **IDENTIFICATION OF THE DEFENDANT**

6. The only Defendant named in this Iran Short Form Complaint is the Islamic Republic of Iran.

### **NO WAIVER OF OTHER CLAIMS**

7. By filing this Iran Short Form Complaint, Plaintiffs are not waiving any right to file suit against any other potential defendants or parties.

8. By filing this Iran Short Form Complaint, Plaintiffs are not opting out of any class that the Court may certify in the future.

### **JURY DEMAND**

9. Each Plaintiff hereby demands a trial by jury as to the claims in this action.

WHEREFORE, Plaintiffs pray for relief and judgment against Defendant as set forth in this Iran Short Form Complaint as appropriate.

Dated: December 23, 2019

Respectfully submitted,

/s/ Jerry S. Goldman

Jerry S. Goldman, Esq.  
Bruce E. Strong, Esq.  
Samantha E. Smith, Esq.  
Stephen Wah, Esq.  
ANDERSON KILL P.C.  
1251 Avenue of the Americas  
New York, New York  
Telephone: 212-278-1000  
[jgoldman@andersonkill.com](mailto:jgoldman@andersonkill.com)  
[bstrong@andersonkill.com](mailto:bstrong@andersonkill.com)  
[ssmith@andersonkill.com](mailto:ssmith@andersonkill.com)  
[swah@andersonkill.com](mailto:swah@andersonkill.com)

*Attorneys for Plaintiffs*

## APPENDIX

Each line below is deemed an allegation, incorporating the allegations, language, and references within the Iran Short Form Complaint to which this Appendix 1 is appended and shall be referenced as Allegation 1 of Appendix 1 to the Iran Short Form Complaint, Allegation 2 of Appendix 1 to the Iran Short Form Complaint, etc.

	<b>Plaintiff's Name (alphabetical by 9/11 Decedent's last name)</b>	<b>Plaintiff's State of Residency at Filing (or death)</b>	<b>Plaintiff's Citizenship/ Nationality on 9/11/01</b>	<b>9/11 Decedent's Full Name</b>	<b>Plaintiff's Relationship to 9/11 Decedent<sup>1</sup></b>	<b>9/11 Decedent's Citizenship/ Nationality on 9/11/01</b>	<b>Nature of Claim (wrongful death, solatium, personal injury)<sup>2</sup></b>
1	BNY Mellon	NY	United States	Humberto Ailinger	PR	TBD	Solatium/ Wrongful Death
2	Brian Wilkes	NJ	United States	Lorraine Antigua	Fiance	United States	Solatium
3	John Doe 76	NY	United States	Lorraine Antigua	PR	United States	Solatium/ Wrongful Death
4	Joan Ruth Puwalski	NY	United States	Steven J. Bates	Spouse	United States	Solatium
5	John Doe 70	NY	United States	Steven J. Bates	PR	United States	Solatium/ Wrongful Death
6	BNY Mellon as Personal Representative of the Estate of Ivhan Bautista	NY	United States	Ivhan Bautista	PR	Peru	Solatium/ Wrongful Death
7	Justin Johnson	NJ	United States	Janice Brown	Child	United States	Solatium
8	John Doe 77	NY	United States	Janice Brown	PR	United States	Solatium/ Wrongful Death

<sup>1</sup> For those identified as "PR," such claim is made as the Personal Representative of the Decedent's Estate and on behalf of all survivors and all legally entitled beneficiaries and family members of such Decedent as noted in the case caption.

<sup>2</sup> The PRs identified below are bringing solatium claims on behalf of all survivors and all legally entitled beneficiaries and family members of such Decedent as noted in the case caption.

	<b>Plaintiff's Name (alphabetical by 9/11 Decedent's last name)</b>	<b>Plaintiff's State of Residency at Filing (or death)</b>	<b>Plaintiff's Citizenship/ Nationality on 9/11/01</b>	<b>9/11 Decedent's Full Name</b>	<b>Plaintiff's Relationship to 9/11 Decedent<sup>1</sup></b>	<b>9/11 Decedent's Citizenship/ Nationality on 9/11/01</b>	<b>Nature of Claim (wrongful death, solatium, personal injury)<sup>2</sup></b>
9	Emily Cournoyer, as Personal Representative of the Estate of Alice Beaton	MA	United States	John Cahill	Sibling (Deceased)	United States	Solatium
10	Nicole Mayer	NY	United States	Peter J. Carroll	Child	United States	Solatium
11	Pete Carroll	NY	United States	Peter J. Carroll	Child	United States	Solatium
12	Christopher Carroll	NY	United States	Peter J. Carroll	Child	United States	Solatium
13	Michael Carroll	NY	United States	Peter J. Carroll	Child	United States	Solatium
14	Kevin Carroll	NY	United States	Peter J. Carroll	Sibling	United States	Solatium
15	Patricia D'Agata	NY	United States	Peter J. Carroll	Sibling	United States	Solatium
16	Brieann Centro	NY	United States	Alexander Centro, Jr.	Child	United States	Solatium
17	Alexander Centro	NY	United States	Alexander Centro, Jr.	Child	United States	Solatium
18	Alexander Centro	NY	United States	Alexander Centro, Jr.	PR	United States	Solatium/ Wrongful Death
19	Craig Centro	NY	United States	Alexander Centro, Jr.	Child	United States	Solatium
20	Craig Centro, as Personal Representative of the Estate of Italia Centro	NY	United States	Alexander Centro, Jr.	Parent (Deceased)	United States	Solatium

	<b>Plaintiff's Name (alphabetical by 9/11 Decedent's last name)</b>	<b>Plaintiff's State of Residency at Filing (or death)</b>	<b>Plaintiff's Citizenship/ Nationality on 9/11/01</b>	<b>9/11 Decedent's Full Name</b>	<b>Plaintiff's Relationship to 9/11 Decedent<sup>1</sup></b>	<b>9/11 Decedent's Citizenship/ Nationality on 9/11/01</b>	<b>Nature of Claim (wrongful death, solatium, personal injury)<sup>2</sup></b>
21	Anthony Chiofalo	NY	United States	Nicholas Chiofalo	Sibling	United States	Solatium
22	Donna Chiofalo	GA	United States	Nicholas Chiofalo	Sibling	United States	Solatium
23	Annette Melillo	GA	United States	Nicholas Chiofalo	Sibling	United States	Solatium
24	Rosemarie Maggiore	NY	United States	Nicholas Chiofalo	Parent	United States	Solatium
25	George Coughlin, as Personal Representative of the Estate of Mary Elizabeth Coughlin	NJ	United States	John G. Coughlin	Parent (Deceased)	United States	Solatium
26	George Coughlin	NJ	United States	John G. Coughlin	Sibling	United States	Solatium
27	Carol L. D'Allara	NY	United States	John D'Allara	PR	United States	Solatium/ Wrongful Death
28	Daniel D'Allara as Personal Representative of the Estate of John D'Allara, Sr.	NY	United States	John D'Allara	Parent (Deceased)	United States	Solatium
29	Daniel D'Allara as Personal Representative of the Estate of Helen D'Allara	NY	United States	John D'Allara	Parent (Deceased)	United States	Solatium
30	John Joseph D'Allara	NY	United States	John D'Allara	Child	United States	Solatium

	<b>Plaintiff's Name (alphabetical by 9/11 Decedent's last name)</b>	<b>Plaintiff's State of Residency at Filing (or death)</b>	<b>Plaintiff's Citizenship/ Nationality on 9/11/01</b>	<b>9/11 Decedent's Full Name</b>	<b>Plaintiff's Relationship to 9/11 Decedent<sup>1</sup></b>	<b>9/11 Decedent's Citizenship/ Nationality on 9/11/01</b>	<b>Nature of Claim (wrongful death, solatium, personal injury)<sup>2</sup></b>
31	Nicholas Michael D'Allara	NY	United States	John D'Allara	Child	United States	Solatium
32	Carol L. D'Allara	NY	United States	John D'Allara	Spouse	United States	Solatium
33	RoseEllen Dowdell	NY	United States	Kevin Christopher Dowdell	Spouse	United States	Solatium
34	RoseEllen Dowdell	NY	United States	Kevin Christopher Dowdell	PR	United States	Solatium/ Wrongful Death
35	Patrick Kevin Dowdell	NY	United States	Kevin Christopher Dowdell	Child	United States	Solatium
36	James Michael Dowdell	NY	United States	Kevin Christopher Dowdell	Child	United States	Solatium
37	Amy Eberling	NJ	United States	Dean P. Eberling	Spouse	United States	Solatium
38	Amy Eberling	NJ	United States	Dean P. Eberling	PR	United States	Solatium/ Wrongful Death
39	Corinne Ardente	NJ	United States	Dean P. Eberling	Child	United States	Solatium
40	Lauren Eberling	NJ	United States	Dean P. Eberling	Child	United States	Solatium
41	Beverly Epps	SC	United States	Christopher Samuel Epps	Sibling	United States	Solatium
42	Debra Epps	NY	United States	Christopher Samuel Epps	Sibling	United States	Solatium
43	Valerie Epps Kendall	NY	United States	Christopher Samuel Epps	Sibling	United States	Solatium



	<b>Plaintiff's Name (alphabetical by 9/11 Decedent's last name)</b>	<b>Plaintiff's State of Residency at Filing (or death)</b>	<b>Plaintiff's Citizenship/ Nationality on 9/11/01</b>	<b>9/11 Decedent's Full Name</b>	<b>Plaintiff's Relationship to 9/11 Decedent<sup>1</sup></b>	<b>9/11 Decedent's Citizenship/ Nationality on 9/11/01</b>	<b>Nature of Claim (wrongful death, solatium, personal injury)<sup>2</sup></b>
44	Chundera Epps	NY	United States	Christopher Samuel Epps	Sibling	United States	Solatium
45	Robert Epps	PA	United States	Christopher Samuel Epps	Sibling	United States	Solatium
46	John Doe 73, as Personal Representative of the Estate of Geneva Epps	NY	United States	Christopher Samuel Epps	Parent (Deceased)	United States	Solatium
47	John Doe 74	NY	United States	Christopher Samuel Epps	PR	United States	Solatium/ Wrongful Death
48	Theresa Fiorelli	NJ	United States	Stephen J. Fiorelli	Spouse	United States	Solatium
49	Theresa Fiorelli	NJ	United States	Stephen J. Fiorelli	PR	United States	Solatium/ Wrongful Death
50	Stephen J. Fiorelli, Jr.	NJ	United States	Stephen J. Fiorelli	Child	United States	Solatium
51	Christine Epstein	NJ	United States	Stephen J. Fiorelli	Child	United States	Solatium
52	William Fiorelli	NJ	United States	Stephen J. Fiorelli	Sibling	United States	Solatium
53	Kenneth Fiorelli	NJ	United States	Stephen J. Fiorelli	Sibling	United States	Solatium
54	Karen Fiorelli	NJ	United States	Stephen J. Fiorelli	Sibling	United States	Solatium
55	John Doe 68	NY	United States	Anthony E. Gallagher	PR	United States	Solatium/ Wrongful Death
56	Laurie Gambino	FL	United States	Thomas Gambino, Jr.	Sibling	United States	Solatium
57	Marilyn Hess	FL	United States	Thomas Gambino, Jr.	Parent	United States	Solatium

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58	Thomas Gambino, Sr.	FL	United States	Thomas Gambino, Jr.	Parent	United States	Solatium
59	Keith Gambino	FL	United States	Thomas Gambino, Jr.	Sibling	United States	Solatium
60	Valerie Gambino	FL	United States	Thomas Gambino, Jr.	Sibling	United States	Solatium
61	Thomas Gambino, III	NY	United States	Thomas Gambino, Jr.	Child	United States	Solatium
62	Brian Gambino	FL	United States	Thomas Gambino, Jr.	Child	United States	Solatium
63	Janet Gambino	NY	United States	Thomas Gambino, Jr.	Spouse	United States	Solatium
64	Janet Gambino	NY	United States	Thomas Gambino, Jr.	PR	United States	Solatium/ Wrongful Death
65	John T. Genovese	NY	United States	Steven Genovese	Sibling	United States	Solatium
66	John T. Genovese as Personal Representative of the Estate of Veronica Genovese	NY	United States	Steven Genovese	Parent (Deceased)	United States	Solatium
67	John T. Genovese as Personal Representative of the Estate of John G. Genovese	NY	United States	Steven Genovese	Parent (Deceased)	United States	Solatium
68	John T. Genovese	NY	United States	Steven Genovese	PR	United States	Solatium/ Wrongful Death

	<b>Plaintiff's Name (alphabetical by 9/11 Decedent's last name)</b>	<b>Plaintiff's State of Residency at Filing (or death)</b>	<b>Plaintiff's Citizenship/ Nationality on 9/11/01</b>	<b>9/11 Decedent's Full Name</b>	<b>Plaintiff's Relationship to 9/11 Decedent<sup>1</sup></b>	<b>9/11 Decedent's Citizenship/ Nationality on 9/11/01</b>	<b>Nature of Claim (wrongful death, solatium, personal injury)<sup>2</sup></b>
69	Patti Ann Valerio	NY	United States	Matthew J. Grzymalski	Sibling	United States	Solatium
70	Paul Joseph Grzymalski	NY	United States	Matthew J. Grzymalski	Sibling	United States	Solatium
71	Peter John Grzymalski	NC	United States	Matthew J. Grzymalski	Sibling	United States	Solatium
72	Joseph Walter Grzymalski	NY	United States	Matthew J. Grzymalski	Sibling	United States	Solatium
73	Jo Ann McManus	SC	United States	Matthew J. Grzymalski	Sibling	United States	Solatium
74	Patricia Byrne	NY	United States	Joseph Gullickson	Sibling	United States	Solatium
75	Patricia Gullickson as Personal Representative of the Estate of Robert Gullickson, Sr.	NY	United States	Joseph Gullickson	Parent (Deceased)	United States	Solatium
76	Thomas Gullickson	NY	United States	Joseph Gullickson	Sibling	United States	Solatium
77	Patricia Gullickson	NY	United States	Joseph Gullickson	Parent	United States	Solatium
78	Ralph Gullickson	NY	United States	Joseph Gullickson	Sibling	United States	Solatium
79	Robert Gullickson, Jr.	NJ	United States	Joseph Gullickson	Sibling	United States	Solatium
80	Jake Halloran	NY	United States	Vincent G. Halloran	Child	United States	Solatium
81	Kieran Halloran	NJ	United States	Vincent G. Halloran	Child	United States	Solatium

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82	Marie Halloran, as Natural Guardian of PH	NY	United States	Vincent G. Halloran	Child (Minor)	United States	Solatium
83	Declan Halloran	NY	United States	Vincent G. Halloran	Child	United States	Solatium
84	Marie Halloran	NY	United States	Vincent G. Halloran	Spouse	United States	Solatium
85	Marie Halloran	NY	United States	Vincent G. Halloran	PR	United States	Solatium/ Wrongful Death
86	Iris Marie Holohan	NY	United States	Thomas P. Holohan	Mother	United States	Solatium
87	Mary Alice Holohan	NY	United States	Thomas P. Holohan	Sibling	United States	Solatium
88	Megan Holohan	NY	United States	Thomas P. Holohan	Sibling	United States	Solatium
89	Sean Holohan	NY	United States	Thomas P. Holohan	Sibling	United States	Solatium
90	Aidan Halloran	NY	United States	Vincent G. Halloran	Child	United States	Solatium
91	Conor Halloran	DC	United States	Vincent G. Halloran	Child	United States	Solatium
92	John Doe 83, as Personal Representative of the Estate of Timothy Haviland	NY	United States	Timothy Haviland	PR	United States	Solatium/ Wrongful Death
93	Jesse Kemp	NY	United States	Timothy Haviland	Child	United States	Solatium

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94	Barbara Keane, as Personal Representative of the Estate of Amy Haviland	PA	United States	Timothy Haviland	Spouse (Deceased)	United States	Solatium
95	Harold Hughes	NJ	United States	Thomas F. Hughes, Jr.	Sibling	United States	Solatium
96	Tara Leonardi	PA	United States	Thomas F. Hughes, Jr.	Sibling	United States	Solatium
97	Erin Murray as Personal Representative of the Estate of Kevin T. Hughes	NJ	United States	Thomas F. Hughes, Jr.	Sibling (Deceased)	United States	Solatium
98	Mark F. Hughes	NC	United States	Thomas F. Hughes, Jr.	Sibling	United States	Solatium
99	Martin S. Hughes as Personal Representative of the Estate of Frances S. Hughes	CA	United States	Thomas F. Hughes, Jr.	Parent (Deceased)	United States	Solatium
100	Martin S. Hughes	CA	United States	Thomas F. Hughes, Jr.	Sibling	United States	Solatium